

Message

From: Topinka, Natalie [topinka.natalie@epa.gov]
Sent: 2/27/2019 8:50:23 PM
To: Breneman, Sara [breneman.sara@epa.gov]; Frank, Nathan [frank.nathan@epa.gov]
Subject: RE: OAR Final Agency Review Meeting on SAN 6616, Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review

I will prepare a briefing memo for Cathy – this is a Tier 1 rule on which she will have to sign off on the Region's position. As a reminder, this is the NSPS OOOOa reconsideration which rescinds regulation of methane. I had not seen any final drafts of the rule until the meeting request came this afternoon, so it will take me a bit of time to go through it. The workgroup fought to be allowed 10 days prior to FAR (OAR wanted to allow only 5) to review the materials and brief it up.

If the FAR meeting is March 14, what do you think our deadline is for getting the memo to Cathy (besides "ASAP")?

Since the action was totally a top-down directive and the Regional workgroup members were not actually involved in any of the policy decisions, I would like to recommend avoiding putting forth a concurrence/comments/non-concurrence position, if I could. However, in lieu of being allowed to do that, I expect that the bulk of the memo will simply state that the workgroup members were not part of policy decisions, and to recommend "Concur with Comments," which will highlight some areas of major litigation risk if this rule goes final as written.

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From: Maldonado, Mayra
Sent: Wednesday, February 27, 2019 2:33 PM
To: Nam, Ed <nam.ed@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>
Cc: Jencius, Morgan <jencius.morgan@epa.gov>; Frank, Nathan <frank.nathan@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Schwebke, Peggy <schwebke.peggy@epa.gov>
Subject: OAR Final Agency Review Meeting on SAN 6616, Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review

Attached is Final Agency Review meeting invitation on SAN 6616, Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review, scheduled on March 14, 2019, 12:30 - 1:30 pm (CT).

I'm sure you probably have this covered, but as a precaution we routinely ask the involved division(s) the following:

- Has Cathy Stepp been briefed on this action and do you know and understand her position?
- Are you planning on briefing Cathy before this meeting?
- Do you know if Cathy is planning to attend?
- If Cathy will not be attending has someone been delegated by her to put forward the R5 position?

Please let me know prior to this meeting.

Thanks,

Mayra Maldonado, Associate Regional Planner
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